

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF TEXAS
EL PASO DIVISION**

BRANDON CALLIER,	§	
	§	
Plaintiff,	§	
	§	
vs.	§	
CENTURY RELIEF LLC d/b/a CENTURY	§	Civil Action No. EP-21-CV-00070-DCG
DEBT RELIEF, a New Jersey Limited	§	
Liability Company, BARRY SHARGEL,	§	
and EMIL YASHAYEV,	§	
	§	
Defendants.	§	
	§	

**UNOPPOSED MOTION FOR EXTENSION OF TIME TO ANSWER OR
OTHERWISE RESPOND TO PLAINTIFF'S COMPLAINT**

Defendants, Century Relief LLC d/b/a Century Debt Relief, Barry Shargel, and Emil Yashayev, on consent of Plaintiff, Brandon Callier, respectfully move this Court for an Order extending their deadline until May 21, 2021, to answer or otherwise respond to Plaintiff's Complaint. In support of their Motion, Defendants respectfully show good cause as follows:

1. On March 22, 2021, Plaintiff filed his complaint [Doc. 1] and, on March 30, 2021,

Defendants were personally served with the summons and complaint [Doc. 3]. Thus, April 20, 2021, is Defendants' deadline to file a responsive pleading to Plaintiff's Complaint. Fed. R. Civ. P. 12(a)(1)(A)(i); Fed. R. Civ. P. 6(a)(1)(C).

2. The undersigned counsel were recently retained to represent the Defendants and they have not yet had an opportunity to fully investigate the Complaint's factual allegations or claims and, therefore, need Defendants need additional time to prepare and file a response.

3. This is Defendants' first request for an extension of their responsive pleading deadline and, as the Certificate of Conference indicates, Plaintiff does not oppose their request.

WHEREFORE, Defendants respectfully request the Court extend their deadline to answer or otherwise respond to Plaintiff's Complaint until May 21, 2021.

Dated: April 20, 2021

s/ Andrew T. Thomasson

Andrew T. Thomasson (NJ Bar No. 048362011)
Katelyn B. Busby (AR Bar No. 2014133)
THOMASSON PLLC
350 Springfield Avenue, Suite 200
Telephone: (973) 312-0774
Facsimile: (973) 559-5579
E-Mail: Andrew@Thomassonllc.com
E-Mail: Katelyn@Thomassonllc.com

*Counsel for Defendants, Century Relief LLC
d/b/a Century Debt Relief, Barry Shargel, and
Emil Yashayev*

CERTIFICATE OF CONFERENCE

I, Andrew T. Thomasson, hereby certify that on April 20, 2021, in accordance with Rule CV-7(i), I conferred by telephone and email with Plaintiff about the disposition of this Motion and Plaintiff confirmed he does not oppose the relief requested in this Motion.

s/ Andrew T. Thomasson

Andrew T. Thomasson

CERTIFICATE OF SERVICE

I, Andrew T. Thomasson, hereby certify under penalty of perjury that on April 20, 2021, I served the foregoing documents on the Clerk of Court for the United States District Court for the Western District of Texas by using its CM/ECF system. I also certify that the foregoing documents are being served this day on all counsel and Parties of record to this action in the manner specified, either via transmission of Notice of Electronic Filing generated by using this Court's CM/EFC system or in some other authorized manner for those counsel or parties who are not authorized to receive electronic Notices of Electronic Filing as indicated on the Court's docket for this action.

s/ Andrew T. Thomasson

Andrew T. Thomasson